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3 HONORABLE THERESA L. FRICKE
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IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON (TACOMA)

10 UNITED STATES OF AMERICA,)
11 Plaintiff,) NO. MJ23-5134 TLF
12 vs.) DEFENDANT'S DEMAND FOR DISCLOSURE
13 BRYANT KEITH MCCULLOUGH,) OF MATERIAL FAVORABLE TO THE DEFENSE
14 Defendant.)
15)
16 TO: THE UNITED STATES OF AMERICA, Plaintiff
17 AND TO:, Assistant United States Attorneys OFFICE
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PLEASE TAKE NOTICE THAT BRYANT KEITH MCCULLOUGH, the Defendant above-named, pursuant to the Constitutional principals of due process of law set forth by the United States Supreme Court in Brady v. Maryland, 373 U.S. 83, 87, 83 S.Ct 1194, 10 L.Ed.2d 215 (1963), demands that the Government bring to the Defendant's attention, produce for Defendant's inspection, and allow Defendant to copy at his discretion and all evidence or information of any kind in the possession, custody, or control of the Government which is favorable to the Defendant or will be significant benefit to Defendant in his preparation for trial, including, but not limited to:

(a) All documents, books, papers and tangible objects or portions or copies thereof favorable to Defendant; and

DEFENDANT'S DEMAND FOR DISCLOSURE OF
MATERIAL FAVORABLE TO THE DEFENSE

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1 (b) Names and addresses of any and all potential witnesses known to the Government who
2 might give information or testimony favorable to Defendant; and

3 (c) The names and addresses of any and all persons interrogated or interviewed by the
4 Government in connection with this case whom the Government does not plan to call as witnesses at trial.

5 PLEASE TAKE FURTHER NOTICE THAT:

6 1. Upon your failure to comply with this demand, the Defendant will move the Court for an
7 Order to Compel Compliance and/or an order prohibiting the Government from introducing at trial evidence
8 not disclosed.

9 2. If any of the items herein enumerated are presently not known to the United States, but
10 become known to it prior to or during trial, the United States is required to notify the Court or the undersigned
11 promptly of the existence of such evidence or material.

12 DATED this 14TH DAY OF APRIL, 2023.

13 BRYAN G. HERSHMAN LAW OFFICE

14 BY: 
15 BRYAN G. HERSHMAN, WSB# 14380
16 Attorney for Defendant

17 DEFENDANT'S DEMAND FOR DISCLOSURE OF
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